

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
Southern Division

CHARLENE JANSON :
3020 Maryland Avenue
Baltimore, MD 21227 :

Plaintiff :

v. :

Case No: 1:19-cv-00079

REITHOFFER SHOWS, INC. :
Serve: The Corporation Trust, Inc.
2405 York Road
Suite 201
Lutherville Timonium, MD 21093 :

Defendant :

COMPLAINT

Plaintiff, Charlene Janson, by her attorneys, Deborah L. Potter and Suzanne V. Burnett, hereby files suit against the Defendant, Reithoffer Shows Inc., and for reasons, states as follows:

PARTIES AND VENUE

1. The Plaintiff, Charlene Janson, is an adult resident of Baltimore County, Maryland.
2. The Defendant, Reithoffer Shows, Inc. (herein after "Reithoffer") is a business with a principal office in Gibston, Florida participates in fairs, namely in the areas of amusement rides, games, and food concessions.
3. Venue is proper in the United States District Court for the District of Maryland due to diversity jurisdiction.

FACTS

4. On or about September 17, 2016, Plaintiff, Charlene Janson, was an invitee at The Great Frederick Fair in Frederick, Maryland.
5. Defendant Reithoffer Shows, Inc. provided amusement rides at the Great Frederick Fair.
6. The Defendant and its employees and its agents were responsible for the set up, placement, and operations safety of the amusement rides.
7. The Defendant was responsible for setting and/or following and/or enforcing all amusement ride restrictions, rules, procedures, and regulations as well as generally providing a safe and secure environment.
8. The Defendant provided at the Great Frederick Fair a ride known as the "space ride" which was set up, placed, and/or operated by the Defendant.
9. Plaintiff was on the "space ride" when her foot became caught in the ride, causing her to fall from the platform.
10. There were no measures and/or insufficient measures taken to ensure ride restrictions, rules and/or regulations were enforced and that invitees were able to safely board the ride.
11. Further, Defendant's employees were not adequately trained and/or supervised on procedures.
12. Further, Defendant and/or its employees/agents/servants failed to warn Plaintiff of the hazards/dangers of the "space ride."
13. Plaintiff was injured and has undergone multiple surgeries, missed work, and will require future surgeries and future loss of income.

14. At all times relevant herein, the Plaintiff, Charlene Janson, was exercising due care, and was free of negligence.

COUNT I

11. Plaintiff, Charlene Janson, realleges the facts and allegations set forth in all previous paragraphs, and further states as follows:

12. The negligence of the Defendant and its employees were the proximate cause of the incident in that said Defendant failed to establish amusement ride restrictions/rules/regulations for height and/or weight, failed to follow amusement ride restrictions/rules/regulations for height and/or weight, failed to enforce amusement ride restrictions/rules/regulations, failed to properly train employees, failed to properly supervise employees, negligently set up the ride in a manner that was unsafe and/or unreasonably dangerous, failed to assist invitees as they boarded the ride, failed to have handrails/equipment or other safety measures in place to assist invitees as they boarded the ride, failed to supervise and/or assist invitees as they boarded the ride, failed to have signage/restrictions for weight and/or height at the ride, failed to post restrictions for height/weight for invitees to see, failed to warn invitees of a danger known to the Defendant; and was otherwise careless and negligent.

13. As a result of the negligence of said Defendant, Plaintiff did suffer and continues to suffer great pain and permanent injury, permanent scarring and disfigurement, mental anguish, loss of income, and has incurred and in the future will incur medical expenses.

WHEREFORE, Plaintiff, Charlene Janson, demands judgment against said

Defendants in excess of Seventy-Five Thousand (\$75,000.00) Dollars.



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DEMAND FOR JURY TRIAL

Plaintiff demands Trial by Jury on all issues herein.



Deborah L. Potter